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6 Attorney for Defendant Robert A. Bisom

7 IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

8 ROBERT D. BRADSHAW,) CASE NO. CV 05-00027
9 Plaintiff,)
10 vs.)
11 COMMONWEALTH OF THE NORTHERN) ROBERT A. BISOM'S INITIAL
12 MARIANA ISLANDS, NICOLE C. FORELLI,) DISCLOSURES
13 WILLIAM C. BUSH, D. DOUGLAS COTTON,)
14 L. DAVID SOSEBEE, ANDREW CLAYTON,)
15 UNKNOWN AND UNNAMED PERSONS IN)
16 THE CNMI OFFICE OF THE ATTORNEY)
GENERAL, PAMELA BROWN, ROBERT)
BISOM and JAY H. SORENSEN,)
Defendants.)

17 COMES NOW, Defendant ROBERT A. BISOM, by and through his attorney,
18 pursuant to Fed. R. Civ. P. 26(a)(1) and LR 16.2CJ(d), with the following disclosures:¹

19 **A. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION**

20 The following individuals and entities are likely to have discoverable information that
21 Defendant Bisom may use to support his claims in this case:

- 22 1. Plaintiff;
23 2. Defendant Jay Sorensen and the witnesses identified by Mr. Sorensen in his
24 initial disclosures;

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27 ¹ A copy of Defendant Bisom's Initial Disclosures has been filed with the Court. See
28 L.R. 16.2CJ.d.

3. Some or all of the AG defendants.

Defendant Bisom reserves the right to amend and supplement this list if additional information becomes available during the course of discovery, pursuant to Fed. R. Civ. P. 26(e).

B. LISTING, DESCRIPTION AND LOCATION OF DOCUMENTS, DATA COMPILATIONS AND TANGIBLE THINGS

1. Pleadings and records on file in *Bisom v. CNMI, et al.*, Civil Action No. 96-1320 (CNMI Super. Ct.) and *Bradshaw v. CNMI, et al.*, Civil Action No. 05-0084 (D. Idaho);

2. Documents identified by Defendant Sorensen in his initial disclosures.

Defendant Bisom reserves the right to amend and supplement this list if additional information becomes available during the course of discovery, pursuant to Fed. R. Civ. P. 26(e).

C. COMPUTATION OF DAMAGES

Not applicable.

D. LIABILITY INSURANCE AGREEMENT

None.

E. CERTIFICATION

Pursuant to Fed. R. Civ. P. 26(g)(1), I hereby certify that to the best of my knowledge, information, and belief, formed after reasonable inquiry, that the above disclosure is complete and correct as of the date set forth below.

Respectfully submitted this 26th day of March, 2007.

/s/ Mark B. Hanson

MARK B. HANSON

Attorney for Defendant Bisom

1 CERTIFICATE OF SERVICE
2

3 I hereby certify that a copy of the foregoing was deposited in the United States Post
4 Office, first class mail, postage prepaid, addressed to the following:

5 Robert D. Bradshaw, Plaintiff *pro se*
6 P.O. Box 473
7 1530 W. Trout Creek Road
8 Calder, Idaho 83808

9 Jay H. Sorensen, Esq.
10 c/o Shanghai
11 Post Office Box 9022
12 Warren, MI 48090-9022

13 I further certify that the following were served with a copy of the foregoing via the
14 Court's electronic case filing system:

15 Gregory Baka, Assistant Attorney General
16 Office of the Attorney General
17 Civil Division—Capitol Hill
18 Second Floor, Juan A. Sablan Memorial Building
19 Caller Box 10007
20 Saipan, MP 96950

21 DATED: _____
22 March 26, 2007

23 /s/ Mark B. Hanson
24 MARK B. HANSON